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) **No. 3:20-cv-00628**  
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) **Judge Eli J. Richardson**  
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)  
) **Magistrate Judge Frensley**  
) **Jury Demand**  
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Case 3:20-cv-00628 Document 33 Filed 03/30/21 Page 1 of 3 PageID #: 473

is requesting this date be moved to **September 17, 2021**.

- Initial Deadline to file all Motions to Amend on or before **February 5, 2021**.  
Plaintiff is requesting this date be moved to **June 30, 2021**.
- Initial Deadline for Plaintiff to identify and disclose all expert witnesses and expert reports on or before **May 30, 2021**, and defendant to identify and disclose all expert witnesses and reports on or before **June 27, 2021**. Expert depositions shall be completed by **September 30, 2021**. Plaintiff is requesting these dates be moved to **June 18, 2021** for Plaintiff's Expert Disclosures, and **August 6, 2021** for Defendant's Expert Disclosures, and depositions completed by **September 30, 2021**.

This motion will not affect the trial date of April 5, 2022, or dispositive motion deadline of October 22, 2021.

Respectfully submitted,

s/ Heather Moore Collins  
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**CERTIFICATE OF SERVICE**

I HEREBY certify that a copy of the foregoing has been e-mailed this the 24th day of March 2021 to counsel of record through the court's CM/ECF system:

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